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NTT America, Inc.

101 Park Avenue, 41st Floor

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April 25, 2011

Marlene H. Dortch  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW, Suite TW-A325  
Washington, DC 20554

Re: EB Docket No. 06-36

Dear Ms. Dortch:

Enclosed, please find the 2010 Customer Proprietary Network Information Certificate ("CPNI") which NTT America, Inc., pursuant to 47 C.F.R. §64.2009(e), hereby submits.

Copies of the certification and statement are being delivered today as follows:

FCC Secretary	One Copy
FCC Enforcement Bureau	Two Copies
Best Publishing and Printing, Inc.	One Copy

If you have any questions regarding this filing, please do not hesitate to contact the undersigned.

Respectfully Submitted,

NTT America, Inc.

By:   
Alex Morel

No. of Copies rec'd 0  
List A B C D E

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**Annual 47 C.F.R. § 64.2009(e) CPNI Certification**

**EB Docket 06-36**

Annual 64.2009(e) CPNI Certification for 2010

Date filed: April 25, 2011

Name of company(s) covered by this certification: NTT America, Inc.

Form 499 Filer ID: 826583

Name of signatory: Saturo Fujimoto

Title of signatory: Vice President and Secretary.

I, Saturo Fujimoto, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See* 47 C.F.R. § 64.2001 *et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

Signed

Saturo Fujimoto

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NTT America, Inc.

**Statement on CPNI Compliance**

NTT America provides exclusively to its customers information services and/or "telecommunications", but not "telecommunications service", as those terms are defined in sections 3(20), 3(43) and 3(46), respectively, of the Communications Act. Therefore, NTT America is not a "telecommunications carrier", as that term is defined in section 3(44) of the Act. The certification requirement in section 64.2009(e) of the Commission's Rules applies by its terms exclusively to a "telecommunications carrier." Because NTT America is not a "telecommunications carrier", section 64.2009(e) does not apply to its operations.

For the additional information of the Commission, NTT America, which serves only large enterprises, does not use any information that would be considered to be CPNI if NTT America provided "telecommunications services" except in the provision or marketing of services among the category of service to which a customer already subscribes. NTT America does not disclose or permit the use of any such information by any agents, affiliates or third parties to market its services. However, NTT America may, pursuant to the express affirmative consent of the customer as set forth in a customer contract, provide services jointly with affiliates or a third party. NTT America personnel are trained to protect the confidential information of its customers. Customer information is provided only to designated customer personnel by designated account representatives. Network security and liaison with law enforcement are governed by a confidential network security agreement entered into between NTT America, NTT Verio Inc, and their parent corporation, NTT Communications Corporation, on the one hand, and the Department of Justice, the Department of Homeland Security and the Department of the Treasury, on the other.